

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.001

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

It is great that environmental sustainability lies at the heart of the Vision as well as of Aims 2 ('An environmentally sustainable city') and 7 ('A green city that continues to cherish, protect and enhance its biodiversity and green and blue infrastructure.').

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Policy beefed up so that green heritage is not destroyed in the future unnecessarily

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.002

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy SP1: Overall Growth Plan

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

8. The following paragraph is unsound.

“The Sheffield Plan will deliver

l) Protection, management and enhancement of designated blue and green infrastructure sites and

assets. With a focus on the Green Network (including the Local Nature Recovery Network) and designated

Urban Greenspace Zones (see policies GS1 to GS11)”

The definition of the ‘Green Network’ refers to Map 17 however Map 17 is not a Green Network map, it is

simply a map of existing green spaces and ecologically designated sites. Neither is it a green infrastructure map or network or strategy and does not show any opportunities for improving or strengthening any networks.

This needs to be improved in line with the newly launched Natural England Green Infrastructure

Framework and does not meet the requirement of para20 of the NPPF “Strategic policies should set out

an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: d)

conservation and enhancement of the natural, built and historic environment including landscapes and

green infrastructure, and planning measures to address climate change mitigation and adaptation”

Green infrastructure is also included in Para92c) and 154a), 186 and 175 (see below)

Definition on p67 of the NPPF “Green infrastructure: A network of multi-functional green and blue spaces

and other natural features, urban and rural, which is capable of delivering a wide range of environmental,

economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.”

A South Yorkshire Green Infrastructure Strategy was produced in 2011 but this has not been referred to, or

updated, and a local Sheffield version has not been produced following the guidance in the Natural

England GI Framework and or the Building with Nature Standards for Local Plan policies

Neither does the map and accompanying policy make reference to the ‘Access to Nature – capacity and

demand maps’ which were developed as part of the South Yorkshire Natural Capital Maps (‘Holt, A.R., Zini,

V. & Ashby, M. (2021) South Yorkshire natural capital and biodiversity mapping, Natural Capital Solutions

Ltd, July 2021’). This is the most up to date and best quality evidence we have for access to nature and it

not referenced.

Also Map 17 does not include the Nature Recovery Network – this need to be separate. Justification –

separation of ecological networks and their components to fully satisfy NPPF policies 174/175/179

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Suggested minor modifications

- “l) Protection, management and enhancement of designated blue and green infrastructure sites

and assets. With a focus on the Green Network (including the Local Nature Recovery Network) and

designated Urban Greenspace Zones” Suggest changing to:

- “(l) Protection, management and enhancement of blue and green infrastructure sites and assets

including designated sites and Urban Greenspace Zones (see Map 17, policies map and policies GS1

to GS11) and the creation of new assets, especially where provision is low”

- Change the name of Map 17 to Blue and Green Infrastructure as it is not a network and may be confused with the nature recovery network– make the blue infrastructure clearer (waterways are

not showing up as they are also LWS) and add opportunity sites.

add new para as follows Identification, protection, enhancement and restoration of ecological networks: the Local Nature

Recovery Network in line with the Local Nature Recovery Strategy/Nature

Emergency Action Plan

(GS5)

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.003

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy SA2: Northwest Sheffield

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Policy SA2 identifies that Hillsborough is an area prone to congestion but does not provide a solution to resolve the issues. It is a low level route and as such is also important (and attracts more traffic) at times of bad weather. Future development in the area could be inhibited if these traffic issues are not resolved. Malin Bridge/ Holme Lane/ Bradfield road is an important branch off the strategic Penistone Road corridor. In addition to serving the tram and local bus services it is a main feeder route for local traffic from Hillsborough, Walkley and Crookes, Loxley, Stannington and Bradfield. Through the A6101 Rivelin Valley Road it is an important outlet for traffic from the western side of Sheffield wanting to access Manchester. As the impact of the inner ring road climate charging zones impact then it may well suffer

from a further diversion of traffic taking avoidance action from the charging zone on the inner ring road . No policy has been put forward to combat such congestion and its effect on the climate. It is noted however that the Council want to support the vibrancy of Hillsborough which may in fact deteriorate if congestion is not reduced

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

SA" Make the A6101 a Strategic Route.

Add an additional item to Policy SA2

g) Deliver sustainable transport improvements, including:

.....

- Make improvements to highway, tram routes and junctions on the A6101, including Malin Bridge, Holme Lane and Bradfield road (together with links to Penistone Road and Middlewood Road) to improve traffic flows and hence reduce congestion and the resultant pollution.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.004

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy SA2: Northwest Sheffield

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

North West Sheffield Sub Area Policy SA2

I support the fact that the site at Storrs Lane in the Loxley Valley known as 'Hepworths' or 'East Works – Former Loxley Works' which was subject to an inappropriate planning application (Ref:20/01301/OUT which was refused by SCC and upheld by the Planning Inspector) is not allocated for housing.

North East Sheffield Sub Area Policy SA3

I support the fact that the site adjacent to J33 (on the west) of the M1 known as Smithy Wood has not been allocated for development. SRWT, along with many other local people and organisations spent 7 years protecting the site from an inappropriate development proposal for a Motorway Service Area, despite the site

being in green belt and designated as a Local Wildlife Site due to its ancient woodland habitats with bluebells and other wild flowers etc

<https://www.wildsheffield.com/campaign/smithy-wood/>

South East Sheffield Sub Area Policy SA5 f)

I support this policy “Designate a Local Green Space at Owlthorpe Fields (Policy GS1)” based on our knowledge of the ecological and recreational value of these fields to the local community.

South Sheffield Sub Area Policy SA6f) I fully support this policy “Designate a Local Green Space at Bolehill Woods at Norton Woodseats” for the ecological and recreational value of these woods to local people and the potential threat from inappropriate development without such protection

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Not completed by respondent

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.005

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy BG1: Blue & Green Infrastructure

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

The draft Plan is strong (Policy BG1 on pg 103 of Part 1) on protecting existing green spaces but lacks sufficient ambition to define and develop new wild and green spaces. Map 17 is captioned as showing 'Blue and Green Infrastructure and the Green Network' whereas, in fact, it largely shows existing sites, many of which are highly disjointed from one another and so cannot realistically be described as a network.

It is appreciated that the Nature Recovery Network currently in preparation across South Yorkshire hasn't yet been included in the Local Plan due to the maps for this not yet being available and that it is the intention of the Council to include this as a supplement – an essential move.

Point 174d in the National Planning Policy Framework expects Local Plans to establish 'coherent ecological networks that are more resilient to current and future pressures' with Point 175 requiring 'a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'.

Point 179b requires plans to 'promote the conservation, restoration and enhancement of ... ecological networks ...'

Such networks are essential if the city is to achieve its aim of a minimum 10% net increase in biodiversity. Enhancement of natural spaces needs to go beyond the currently identified blue and green areas and focus in addition on increasing and improving green space across the city. New areas need to be identified to connect existing blue and green infrastructure. Creation of new assets is particularly needed in areas where current provision is low.

As with brownfield sites, not all green spaces are of equal wildlife value. Some are already excellent

but others contain substantial areas of little wildlife value, particularly where land is primarily

dedicated to sport and recreation. Specific objectives should be included to make such areas better

for wildlife alongside retaining and enhancing their wider recreational value.

Sheffield's rivers and streams play a vital role as wildlife corridors, especially (but not just) for aquatic species such as kingfisher, goosander, dipper and otter (a priority species in the UK

Biodiversity Action Plan and classified as 'Near Threatened' on the IUCN Red List (2004)). With this in mind, the Plan needs to be more ambitious and prescriptive regarding the width of the buffer

zones specified for these – 15 (or even 20) metres seems to be appropriate. Existing natural vegetation including trees and shrubs should be preserved with new ones planted if relevant. This all

ties in well with plans to 'open up' the city's watercourses as well as to avoid development on areas vulnerable to flooding.

Extending the 'natural network' is not just about protecting and enhancing wildlife.

As shown in Figure 12 in the Open Spaces Assessment document (in supporting evidence), Sheffield is currently some way off meeting Natural England's national Accessible Natural Green Space standards. So a 'locally derived access standard' with lower expectations has been developed (Figure 11) but even this doesn't show all areas of the city having sufficient access to Accessible Natural Green Spaces.

Greater ambition is needed i.e. much closer to Natural England's nationally accepted definitions.

Care needs to be taken to ensure that public access to green spaces does not impinge unduly on

biodiversity. Many of Sheffield's green spaces experience considerable pressure from people and dogs. Appropriate sections of public green spaces in which access could be restricted or passively discouraged to protect and enhance biodiversity should be identified. There are already some precedents for this, for example the 'nature reserve' area of Ecclesall Woods and parts of the General Cemetery.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Policy to be reviewed and clarified to protect biodiversity in green spaces where feasible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.006

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy BG1: Blue & Green Infrastructure

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

5.24 Sheffield's blue and green infrastructure is important at all scales and is represented on Map 17".

Unsound. As previously commented – Map 17 does not show Blue & Green Infrastructure

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

See previous comments

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.007

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy BG1: Blue & Green Infrastructure

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

For the reasons outlined in Part 1, SPD1,

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The following minor modifications

Suggest adding and the Nature Recovery Network to the title

Suggest changing: 'Very significant weight will be given to the protection and enhancement of Sheffield's

Green Network of urban greenspace and countryside (including the Local Nature Recovery Network)
especially,..'

to: 'Very significant weight will be given to the protection and enhancement of Sheffield's Blue and Green

Infrastructure and Local Nature Recovery Network, especially...'

Suggest addition "Valuable greenspaces will be protected from inappropriate built development and are

shown on the Policies Map as either Urban Green Space Zones (policy GS1), Greenbelt (GS2) or designated ecological or geological sites (GS5)"

Suggest addition 'New high quality green infrastructure that meets standards* is encouraged' *Such as Building with Nature

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.008

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy ES1: Measures Required to Achieve Net Zero Carbon Emissions in New Development

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

The way in which (Policy ES1 on pg 11 of part 2) new developments need to 'create and restore habitats that absorb carbon, such as wetlands and woodlands' is welcome. I believe RSPB nationally has done some significant work on this with nationally well known house builders to which the Council could be directed. (See <https://www.rspb.org.uk/globalassets/downloads/documents/conservation--sustainability/223-0282-20-21-barratt-developments-plc--rspb-16pp-05-07-21.pdf>)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

To be modified to incorporate the work done nationally referred to above

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.009

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy ES1: Measures Required to Achieve Net Zero Carbon Emissions in New Development

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Government advice defines a clear hierarchy of waste, with re-use of material in its original form the highest priority; recycling (reprocessing into a new product) next; and energy recovery last. The Climate Emergency and mandatory targets on carbon emissions justify a strong policy that recognises the lower energy and climate impacts of re-use. Re-use of buildings is the most effective in climate and resources terms and is

strongly supported by RICS, RIBA, the House of Commons Environmental Audit Committee, European Academies Science Advisory Council (which includes the Royal Society), and the Royal Academy of Engineering. It is especially concerning that a requirement for Whole Life Cycle Carbon Assessments in an earlier draft of the plan has been dropped. Modifications are needed to policy ES1 in order to meet the objective of environmental sustainability (NPPF 8(c)).

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Policy ES1 should be amended to include a “re-use first” policy for both buildings and materials, rigorously enforcing the waste hierarchy and allowing lower priorities only where higher priority options are impossible and to re-instate the requirement for Whole Life Cycle Carbon Assessments.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.010

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Chapter 4: Thriving Neighbourhoods and Communities

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

In relation to point 4.50 on page 48 of part 2 which recognises that 'Integrating open space within development sites ... provides broader environmental benefits and ... can help meet the requirement of providing Biodiversity Net Gain', there is a need to clarify that not all green spaces are of equal value and to specify those which are of the greatest benefit to both people and wildlife.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Cliffy wording and terminology to make the policy clearer

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.011

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Chapter 8: A Green City – Responding to the Biodiversity Emergency

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Policy GS5 calls for development to protect and promote biodiversity. Policy GS6 builds on this by requiring Biodiversity Net Gain. Policies GS9, GS10 and GS11 concern flood risk, water resources and drainage. All have the potential for impact on waterways and waterpower infrastructure, but nowhere in these policies is their heritage value acknowledged, and neither is there any reference to the value of artificial waterways as habitat nor their potential to assist in flood risk mitigation. These are serious omissions, and the policies as

they stand constitute a threat to Sheffield's river valleys and their complex system of man-made infrastructure, described in the Council's Sheffield Waterways Strategy as a globally important place.

These policies currently fall very significantly short of providing sufficiently for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)), recognising historic waterways as an irreplaceable resource to be conserved in a manner appropriate to their significance (NPPF 189) or a positive strategy for the conservation and enjoyment of the historic environment (NPPF 190).

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The wording of policies GS5, GS6, GS9, GS10 and GS11 must be amended to refer explicitly to and protect the heritage value of historic waterways and waterpower infrastructure, and their settings. There should be specific prohibition of measures such as the destruction of historic weirs, changes to water levels in dams and goits, or decanalisation of historic artificial channels

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.012

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Chapter 8: A Green City – Responding to the Biodiversity Emergency

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

As point 8.1 on pg 83 in Part 2 states, “The UK is one of the most nature depleted countries in the world, with species declining at alarming rates ...”, a situation to which the city responded in May 2021 by declaring a Biodiversity Emergency. But the intended Biodiversity Net Gain (BNG) target in the Plan is a modest 10% (Page 17 in Part 1) whereas other places have set elements of it substantially higher than this (e.g. Cambridge at 20% for all council developments).

The way in which clear links have been made between public health, climate change and biodiversity is very much to be welcomed. (e.g. in point 8.2 on pg 83 of Part 2) Although the role of wildlife and green spaces in combating and adapting to climate change is mentioned in Point 8.2 on pg 83 of Part 2, this needs to be given greater weight in the points and policies that follow.

With regard to Point I in Policy GS5 'Development & Biodiversity' (on pg 92 of Part 2), much much greater clarity is needed around the requirement for incorporation of wildlife-friendly design features into new buildings. Although examples (including 'swift bricks') are given in the 'Definitions' box beneath, there is no clear expectation of the extent to which these will be required. What types/percentage of properties will be required to incorporate such measures? For example, requiring swift bricks to be incorporated in all new properties of two storeys or above would not place an unreasonable demand on developers, especially as they are very cheap to incorporate into new brickwork. In 2021, Swifts were added to the 'UK Red List', joining House Sparrow and Starling which have also declined due to changes in building techniques and which can also make use of swift bricks as breeding/roosting spaces. House Martins were another species added to this list in 2021 and these too can benefit from the installation of swift bricks and other artificial nest sites.

In the section on Trees, Woodlands & Hedgerows' it needs to be clarified (e.g. in Policy GS7 pg 95 – 96 in Part 2) that not all new trees are of equal wildlife value. More specific guidance is required on which species would best enhance biodiversity, for example, berry bearing trees and shrubs. It needs to be clarified that, although native species are often the most appropriate, trees and shrubs of value to wildlife do not necessarily need to be native.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Clarify wording as appropriate to cover this deficiency

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.013

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS1: Development in Urban Green Space Zones

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Table 4. Standards for Assessing the Quantity of and Access to Information
Greenspace and Outdoor Sports
Areas

Refers lists 'Access Standards' but it is very unclear for the reader where this list has come from. Only by delving into the Supporting Evidence 'Sheffield Open Space Assessment 2022' where it is clear that is the consultant report has identified that Sheffield does not meet the Natural England Accessible Greenspace

Standards (ANGST) e.g. see Section 7.3.2 and Figures 12-14 in the Assessment. Instead of taking steps to address these gaps in provision in the allocation map or policies, a lower standard of 15minute walk time to an accessible natural greenspace has been suggested in the Assessment. There is no explanation of this in Part2 and no strategic policies to address the gaps identified by both ANGST and this locally suggested lower standards (Figure 11).

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

To be reviewed and wording clarified

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.014

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS5: Development and Biodiversity

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Although examples (including 'swift bricks') are given in the 'Definitions' box beneath, there is no clear

expectation of the extent to which these will be required. For example several UK

Red list bird species –

swifts, house sparrow, startling and house martins can benefit from the inclusion of cheap swift bricks in

all new builds. Integrated bat tiles or bricks are also very affordable and should be standard.

Justification NPPF para179 "Plans should" b) "...and the protection and recovery of priority species"

www.gov.uk/guidance/natural-environment#green-infrastructure Paragraph 023
Reference ID: 8-023-
20190721

www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-
ecosystems
Paragraph: 012 Reference ID: 8-012-20190721

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Suggested minor amendments/clarifications

a) And j) Addition 'and South Yorkshire Local Nature Recovery Strategy/Sheffield Nature Emergency Action Plan'

e) "Prevent the loss of" Suggest changing to:

must include enhancements for the protection and recovery of priority species.

- development of all new dwellings must include swift bricks or other bird roosting opportunities

and bat bricks/tiles and passage for hedgehogs.

- riparian development should include enhancement for riparian species (including bats, otter,

kingfisher) depending on how close the development is (due to buffers)

Suggest amendment to l) (and or the definition of Design features to enhance biodiversity): Design

features to enhance biodiversity and create opportunities for species could include green and brown roofs,

street trees, native shrubs, hedgerows and wildflowers, bird boxes or platforms, swift bricks, bat boxes, bat

bricks or tiles, hedgehog holes...

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.015

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS7: Trees, Woodland and Hedgerows

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Minor suggested changes - see 9

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

9. Suggested minor amendments (in BLOCK),
8.27 Sheffield's trees, woodlands and hedgerows and an important part of the city's green infrastructure and character. They form an important part of the city's distinctive townscape

and provide a setting for relaxation and community activity. Trees and woodlands also play an important role IN THE BIODIVERSITY OF THE CITY, mitigating climate change, AIR QUALITY, TRAFFIC CALMING, WELLBEING and managing flood risk.

Suggested addition of another supportive text paragraph

8.29 Tree planting and woodland creation should be planned and follow recognised good practice and contribute to the delivery of relevant plans and strategies held by SCC or in the wider region such as South Yorkshire wide. Such strategies will relate to tree planting and woodland creation as well as the benefits they provide; natural flood management, nature recovery strategies and climate change mitigation.

Strategies include the Sheffield Street Tree

Strategy, the Sheffield Woodland Strategy and the South Yorkshire Woodland Creation Plan.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.016

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS7: Trees, Woodland and Hedgerows

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

I support this but suggest in 9 some enhancements

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Suggest some minor amendments

9. Add in a paragraph about consequences if trees are removed prior to planning application and whether the consequences would differ for ancient or veteran trees or hedgerows to support b).

Suggested minor addition

“If trees are removed prior to a baseline ecological assessment/planning application then it will assumed that trees were of a very good condition and compensation will be required on that basis.”

Suggested minor amendment

“c) Where existing trees are within or immediately adjacent to a development site, development proposals should give priority to retaining good quality condition trees and ensure that trees are adequately protected during the demolition and/or construction phases of the development”

Also suggest minor amendment in definitions to be in line with standard industry terminology

“Good quality trees’ identified in the tree survey as being of high or moderate value and capable of making a significant contribution to the area for 20 or more years”

Change to:

“Good condition or high heritage value trees” – identified in the tree survey as being of high or moderate condition (Categories A&B) and capable of making a significant contribution to the area for 20 or more years and/or have a significant heritage value.

“f) Locally native species of local origin should be used and, where appropriate reflect similar habitat(s) of ecological importance and not conflict with other important habitats, natural features or archaeological remains”

Suggest minor amendment

“f) Trees and Shrub species should be selected as being appropriate for the situation they are

planted in; complementary to existing and planned habitat creation. First choice should be native broadleaved species and selection should be made to ensure that species planted will thrive in current conditions as well as those modelled in the future climate change scenarios.

Species mixture and planting design to be maximise resilience to potential pests, diseases and pathogens that may be encountered as well as maximise benefit to wildlife and people and following the principle of right tree in the right place.”

Followed by suggested additional paragraph (to distinguish that it is different for street trees)

“Street trees should be chosen in line with current guidance from the Sheffield Street Tree Partnership”

“h) Appropriate provision should be made for ongoing management of any trees, woodland and hedgerows that have been planted and appropriate measures should be put in place to minimise the risk of trees failing.”

Suggest minor amendment

“h) Appropriate provision should be made for ongoing management of any trees, woodland and hedgerows that have been planted and appropriate measures should be put in place to minimise the risk of trees failing, including adequate watering or urban/street trees. Trees that fail in the first five years should be replaced and relevant protective materials should be removed to ensure unrestricted growth and survival. Management (including resources) should provide for a 20% replacement if required.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.017

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS9: Managing Flood Risk

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

“New Development will be permitted where...

a) Is set back from any watercourse (and/or any flood defences on the site) to allow for

future maintenance and biodiversity:

For Main Rivers as agreed with the Environment Agency but a minimum 8m from top of the bank and any flood defences on the site) either side

For ordinary watercourses as agreed with the LLFA but a minimum of 3m from top of the bank (and any flood defences on the site) either side; and

Is unsound - All main Rivers in Sheffield are key ecological corridors and are designated as

Local Wildlife Sites so should be adequately protected and buffered. NPPF 174b) “minimising impacts on and providing net gains for biodiversity, including by establishing ecological networks that are more resilient to current and future pressures’ and 174e “preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans” Suggest 8m is too little to ensure this based on the Environment Agency response in relation to a Planning Appeal for a site in the Loxley Valley in Sheffield (Appeal APP/J4423/W/20/3262600) where the Environment Agency stated “a minimum undeveloped 10 metre wide buffer zone alongside the River Loxley..... The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping.”

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Increase buffer to 20m where feasible (minimum 10m) for main rivers and 5m for ordinary watercourses. This would also be in line with several of the site specific conditions in this draft.

Guidance/policy needed about demolition and replacement or redevelopment of existing buildings which currently do not have a buffer to the river. Suggested addition on policy point

“For sites containing buildings with a smaller buffer to the rivers – replacement buildings should be set back as per this policy. This will not apply to refurbishing buildings of heritage value.”

“c) minimised culverting and no building over open watercourses wherever practicable; and”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.018

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE8: Public Art

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Policy DE8 encourages new public art in development, but does not directly address public art that already exists. Some artworks are heritage assets, but some are newer works, and many have little or no protection.

Financial contributions in lieu of public art are sometimes allowed, which can result in fewer artworks when these are pooled. Provision is needed to follow national guidance in the treatment of statues and other commemorative objects and of contested heritage, but this is missing. Modifications are needed in order to meet the objective of social sustainability (NPPF 8(b)), to make sufficient provision for the conservation and enhancement of the natural, built

and historic environment (NPPF 20(d)), to ensure that developments are sympathetic to all aspects of local character and history (NPPF 130(c)) and to incorporate protections for commemorative objects (NPPF 198)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Policy DE8 should be amended so as to ensure the retention or sensitive relocation of existing artwork,
reinstate previously removed artworks, reflect national policy on statues and commemorative objects,
incorporate Historic England guidance on contested heritage, and ensure that the largest possible number of
developments incorporate locally distinctive artwork by allowing finance in lieu only as a last resort.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.019

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE9: Development and Heritage Assets

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

re is a suggested answer. You can copy it, or you can use your own words or add to it if you prefer.

There should be provision for the proactive identification and designation of new Conservation Areas in order to comply with the Planning (Listed Buildings and Conservation Areas) Act 1990 s69(1). In particular, the Castlegate area, already identified by the Council as of special architectural or historic interest and appraised for designation, should be designated, and its proposed designation reflected in the plan.

Policy DE9 calls for the conservation and sustainable use of heritage assets, including those which are locally listed or non-designated. The policy makes no provision for around forty Areas of Special Character (ASC) which since 1998 have been identified and protected in the Unitary Development Plan for their special architectural or historic interest. These areas are non-designated heritage assets and merit assessment for designation as Conservation Areas, although this has not been done for the great majority of ASCs. Removing their protection is a retrograde step in the protection of the city's historic environment. Although local listing is referred to there is no provision for the creation, maintenance or expansion of the Local Heritage List and no description of its importance. Modifications are needed in these respects to make sufficient provision for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)) and ensure that developments are sympathetic to all aspects of local character and history (NPPF 130(c)).

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Policy DE9 or other relevant policies should be amended so as to maintain protection for Areas of Special Character; provide for the creation, maintenance and expansion of the Local Heritage List; and proactively identify and designate new Conservation Areas, including Castlegate.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.020

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA2: Northwest Sheffield

Which paragraph/site/map layer of the document is representation on:

NWS16

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

In order to make sufficient provision for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)) and ensure that developments are sympathetic to all aspects of local character and history (NPPF 130(c)) the site assessment must include a consideration of all heritage assets that are potentially impacted by development of the site, and should set an expectation that these heritage assets will be retained

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Any development should retain the following heritage assets:
The barracks buildings and related heritage

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.021

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA2: Northwest Sheffield

Which paragraph/site/map layer of the document is representation on:

NWS29

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

It is very positive that the allocated sites for development almost entirely exclude green belt and focus on brownfield sites (Point 3.4 on pg 19 of Part 1).

The designation of Owlthorpe Fields and Bole Hill Wood as Local Green Spaces and the fact that Smithy Wood is not defined as an area for development are all extremely welcome.

Despite the welcome emphasis on developing brownfield sites, not all of these are the same; some may have developed into valuable wildlife habitats. In particular, some of the Site Allocations incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley:

Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3 9QX which includes significant parts of Parkwood Springs LWS). and in the Loxley valley with the old Hepworth Factory site near Dam Flask (NWS)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The boundaries of these Site Allocations should be reviewed and revised to entirely exclude the Local Wildlife Sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.022

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA5: Southeast Sheffield

Which paragraph/site/map layer of the document is representation on:

SES02

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

It is very positive that the allocated sites for development almost entirely exclude green belt and focus on brownfield sites (Point 3.4 on pg 19 of Part 1). The designation of Owlthorpe Fields and Bole Hill Wood as Local Green Spaces and the fact that Smithy Wood is not defined as an area for development are all extremely welcome. Despite the welcome emphasis on developing brownfield sites, not all of these are the same; some may have developed into valuable wildlife habitats. In particular, some of the Site Allocations

incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley: Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3 9QX which includes significant parts of Parkwood Springs LWS). and in the Loxley valley with the old Hepworth Factory site near Dam Flask (NWS)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The boundaries of these Site Allocations should be reviewed and revised to entirely exclude the Local Wildlife Sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.023

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA5: Southeast Sheffield

Which paragraph/site/map layer of the document is representation on:

SES04

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

It is very positive that the allocated sites for development almost entirely exclude green belt and focus on brownfield sites (Point 3.4 on pg 19 of Part 1). The designation of Owlthorpe Fields and Bole Hill Wood as Local Green Spaces and the fact that Smithy Wood is not defined as an area for development are all extremely welcome. Despite the welcome emphasis on developing brownfield sites, not all of these are the same; some may have developed into valuable wildlife habitats. In particular, some of the Site Allocations

incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley: Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3 9QX which includes significant parts of Parkwood Springs LWS). and in the Loxley valley with the old Hepworth Factory site near Dam Flask (NWS)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The boundaries of these Site Allocations should be reviewed and revised to entirely exclude the Local Wildlife Sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.024

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA5: Southeast Sheffield

Which paragraph/site/map layer of the document is representation on:

SES05

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

It is very positive that the allocated sites for development almost entirely exclude green belt and

focus on brownfield sites (Point 3.4 on pg 19 of Part 1).

The designation of Owlthorpe Fields and Bole Hill Wood as Local Green Spaces and the fact that

Smithy Wood is not defined as an area for development are all extremely welcome.

Despite the welcome emphasis on developing brownfield sites, not all of these are the same; some

may have developed into valuable wildlife habitats. In particular, some of the Site Allocations

incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley: Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3 9QX which includes significant parts of Parkwood Springs LWS). and in the Loxley valley with the old Hepworth Factory site near Dam Flask (NWS)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The boundaries of these Site Allocations should be reviewed and revised to entirely exclude the Local Wildlife Sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.271.025

What is your Name: JimC

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex B: Parking Guidelines

Which section of the document is your representation on:

N/A

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

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Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

The maximum provision for parking allowed per new residential build properties seems inadequate to meet the needs of the potential residents and will result in overflow parking onto local road or the residents changing green garden space into parking lots which may inhibit drainage after periods of rain

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

New developments should be planned and designed with sufficient space such that residents cars should not be parked on the local highway or verge/pavement as a

matter of course. The space reserved for each property should be 1 space per one person properties and two per family property unless near the Central area. The size of car spaces should reflect the size of vehicle such residents are likely to own based on their likely lifestyle. (eg larger vehicle in larger properties). Additional spaces should be included in sizeable developments for visitors including tradesmen.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A